



A Complex Litigation & Trial Practice

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May 10, 2023

FILED VIA ECF

Judge Kenneth M. Karas
The Hon. Charles L. Brieant Jr.
Federal Building and United States Courthouse
300 Quarropas St.
White Plains, NY 10601-4150

Re: *Catalano v. Lyons Magnus LLC and TRU Aseptics, LLC*
Index No: 7:22-cv-06867-KMK

Your Honor:

We represent Plaintiff in the above captioned matter. We write, along with counsel for Plaintiffs in the related matters,¹ to update the Court following our correspondence of March 16, 2023.

As previously advised, the parties to this action and in the related matters have reached a settlement in principal for a proposed class-wide settlement. This Court granted our request to file a Motion for Preliminary Approval of class action settlement within 60 days, setting the deadline as May 15, 2023. All counsel are working diligently to finalize the details of the settlement and are collaborating to select a proposed claims administrator. It has become apparent that we will require additional time to finalize the settlement and prepare our Motion for Preliminary Approval. Accordingly, Plaintiff requests that the Court enlarge the time to file a Motion for Preliminary Approval for 25 days, up to and including June 9, 2023. Plaintiff's counsel has spoken with Defendants' counsel and Defendants agree to this request.

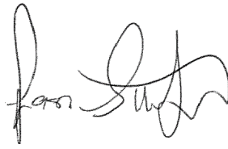
Please kindly advise should Your Honor have any further questions.

¹ The related matters include:

Karen Radford, et al v. Lyons Magnus, LLC and TRU Aseptics, LLC, 1:23-cv-00088 (E. D. Ca.)
Christy Deringer, et al v. Lyons Magnus, LLC and TRU Aseptics, LLC, 1:22-cv-00968 (E.D. Ca.)
Tomoko Nakanishi, et al v. Lyons Magnus, LLC and TRU Aseptics, LLC, 1: 22-cv-06899 (N. D. Ill.)
Veronica Pereya, et al v. Lyons Magnus, LLC and TRU Aseptics, LLC, 1:22-cv-06622 (N. D. Ill.)
Roberta Sinco, et al v. Lyons Magnus, LLC and TRU Aseptics, LLC, 1:22-cv-01479 (E. D. Ca.)
Barbara Speaks, et al v. Lyons Magnus, LLC and TRU Aseptics, LLC, 1:22-cv-01043 (M.D. N.C.)
Edmond Dixon, et al v. Lyons Magnus, LLC and TRU Aseptics, LLC, 2:22-cv-04039 (D. S.C.)

Very truly yours,

THE SULTZER LAW GROUP P.C.

A handwritten signature in black ink, appearing to read "Jason Sultzer", written in a cursive style.

Jason P. Sultzer